

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Annual Assessment of the Status of)	MB Docket No. 12-203
Competition in the Market for the)	
Delivery of Video Programming)	

COMMENTS OF

Philadelphia Public Access Corporation of Philadelphia, Pennsylvania

The Philadelphia Public Access Corporation submits these comments in response to the above captioned Notice of Inquiry (“NOI”), released July 20, 2012, seeking “data, information, and comment on the state of competition in the delivery of video programming.”

The Philadelphia Community Access Media is an independent non-profit 501(c)(3) organization incorporated in 2007 and is the non-profit organization designated by the City of Philadelphia to operate the public access channels. The Philadelphia Public Access Corporation operates under the name Philadelphia Community Access Media (PhillyCAM).

PhillyCAM is community media center that brings together the people of Philadelphia to make and share media that promotes creative expression, democratic values and civic participation. After a nearly 27 year struggle led by a diverse grassroots coalition of individuals and community based organization the City of Philadelphia finally got it’s first public access television station.

In October 2009, PhillyCAM began cablecasting locally produced non-commercial programming on Comcast 66/966 and Verizon 29/30. In February of 2012, PhillyCAM opened its permanent home at 699 Ranstead Street and went live out of its television studios on February 23, 2012.

PhillyCAM now joins the government and educational channels operated by the City of Philadelphia , Community College of Philadelphia (CCTV), Temple University (TUTV), Drexel University (DUTV), LaSalle University and the Philadelphia School District.

Channel Availability

Philadelphia County has two (2) MVPD providers: Comcast and Verizon. PhillyCAM programming is carried on Comcast 66/966 and Verizon 29/30. On Comcast it is only channel 66 that is carried in the must carry, basic cable package.

Channel Program Guide

An essential component of cable television for viewers is the on-channel guide that identifies programming and provides a daily/weekly schedule. It also gives viewers the opportunity to use their DVR to record PEG programming. All commercial channels are listed in the channel guide and viewers expect this feature and are frequently dismayed when it doesn't exist.

After nearly 3 years of requests for the service, PhillyCAM's daily programming schedule is now available on the Comcast cable guide. However, Verizon has taken a firm position that it is not possible for them to make PEG programming available on their cable guide. They have made no attempts to resolve the situation.

HD Carriage

At present neither cable providers for the City of Philadelphia carry PhillyCAM or any of the educational or government channels in high-definition (HD). PhillyCAM opened its new facility in February 2012. All our production and broadcast systems are all high definition. We have the capacity to produce all of our

content in HD.

The majority of our producers are also creating their video programming in HD. Comcast and Verizon only accept an analog SD signal for all PEG channels in Philadelphia. While the center has the capability to produce all of our content in HD, it must be downgraded to inferior SD quality for channel distribution.

PhillyCAM provides access to media-making tools, training and distribution of non-commercial media. Public access television is a tool by which communities can highlight their unique points of view and celebrate their cultures, beliefs and artistic expressions through the production of their own independent media. Public access increases and diversifies the voices in the media; it provides all community members and particularly those in underserved or disenfranchised communities with the tools to tell their stories. The programs seen on PhillyCAM reflect the diverse social, political, ethnic, and artistic communities that can be found in Philadelphia.

PEG channels are a critical and irreplaceable resource for our community. If the Commission fails to prevent the industry practices at issue in the above mentioned petitions and fails to carefully weigh and remedy the impacts of questionable deregulatory legislation, then we have little doubt that other operators will continue to adopt approaches that marginalize or effectively eliminate local PEG access.

Thank you in advance for your attention to this important matter.

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